rcvd 5/14/86 Wong

**BERMITE**

Bermite Division
Whittaker Corporation
22116 West Soledad Canyon Road
Saugus, California 91350
213/629-1403 805/259-2241
Telex 651436

Whittaker

'86 MAY 14 P2:14

May 13, 1986

enforcement

VIA FEDERAL EXPRESS

Ms. Lily Wong (T-2-4)
United States Environmental
Protection Agency
Region IX
215 Fremont Street
San Francisco, California 94105

Re: Bermite Division of Whittaker Corporation
EPA Identification No.: CAD-064573108

Dear Ms. Wong:

This letter is submitted in response to the letter from the Environmental Protection Agency, Region IX ("EPA"), dated April 16, 1986, requesting additional information about the tank used by Bermite as part of its lead azide process from approximately late 1979 through mid-1981. As indicated in our letter to you dated March 14, 1986, we believe that this tank was mistakenly referred to as a surface impoundment in Bermite's Part A Application, filed October 31, 1980, resulting in the confusion in EPA's letter dated February 24, 1986 to Bermite regarding the existence of a lead azide surface impoundment.

In responding to your questions, we have searched the facility's files, including manifests, operating records, and service orders, and spoken with employees who were working at the facility at that time. In the following responses, we have tried to indicate the sources on which our information is based, as well as to describe Bermite's waste management practices during this period in some detail:

1. You asked us to provide our rationale, based upon the criteria set forth in Exhibit A to your April 16 letter (the "Characterization Guidelines"), for considering the tank to be a "tank," rather than a "surface impoundment." The tank in question was a boat hull mold (the "Boat Mold"), of the type used in the production of small boats. In 1979, when it was determined that a holding tank was needed for the lead azide process, the Boat Mold was used as a holding tank for a period of time pending construction of the concrete holding tanks which now are a permanent part of the lead azide process.

On the basis of its structure, shape, size, and constituent materials, the Boat Mold falls within the definition of "tank" as set forth in 40 C.F.R. § 260.10. The Characterization Guidelines identify six general characteristics of a tank, all of which are satisfied by the Boat Mold:

(a) The tank is made primarily of man-made materials. The Boat Mold is made entirely of a fiberglass and steel tubular frame, both of which are man-made materials.

(b) The capacity of the tank is generally "small" relative to that of a surface impoundment. The capacity of the Boat Mold is estimated to be approximately 1,377 gallons. This capacity is "small" compared to many surface impoundments, and is significantly less than the capacity of the two regulated surface impoundments then located at the facility (see below).

(c) The tank has its own shape and does not depend on its surroundings for structural support. As the enclosed pictures (attached as Exhibit A) illustrate, the steel framed fiberglass Boat Mold is a self-contained structure with its own well-defined shape, and does not depend upon any surroundings for its structural support.

(d) The tank will have a continuous, rigid structure. The Boat Mold has a rigid steel-framed and fiberglass structure which is continuous.

(e) The tank is nonpermeable. The Boat Mold is made of steel tube framing and fiberglass, clearly non-permeable materials.

(f) The tank is "inspectable." The Boat Mold sat on the ground and was visible and inspectable.

For the foregoing reasons, we believe the proper characterization of the Boat Mold is as a tank.

2. You asked us to describe the dimensions of the tank and its former location. The inside measurements of the Boat Mold, which is still located at the facility (see below), are: 22 feet 4 inches in length, 7 feet 8 inches wide at the beam and stern; and 3 feet 4 inches in depth (measured on the center line at the beam). The thickness of the fiberglass averages approximately 5/8 inch.

The Boat Mold was located on the ground at the same location as the current lead azide process, in the area where the lower tanks now are located. Attached as Exhibit B is a large facility map on which are marked the general location of the lead azide process and the present location of the Boat Mold. Attached as Exhibit C is an aerial photograph which shows in more detail the current layout of the lead azide process, including the lower tanks which replaced the Boat Mold in mid-1981, and the location of the Boat Mold (approximately 300 yards west of the lead azide process).

3. You asked us to describe the waste received by this tank, identifying the appropriate EPA hazardous waste numbers and the results of any waste analyses. The process at the lead azide facility has not changed significantly since the Boat Mold was used. Therefore, the wastes being received by the Boat Mold were essentially the same as the wastes now being received by the holding tanks which replaced the Boat Mold at the facility.

The lead azide process waste is primarily water, with small amounts (roughly 1% to 2% at most) of lead salts, sodium carbonate, aluminum oxide, and sodium chloride. It is a corrosive waste, and the EPA hazardous waste number is D002. We have not been able to locate copies of any analyses of this waste conducted at the time the Boat Mold was in use. We have contacted Chemical Waste Management Inc., operator of the

Kettleman Hills Class I hazardous waste disposal facility ("Kettleman Hills") to which Bermite's waste was sent for disposal, in an effort to locate copies of such analyses. Kettleman Hills is searching its records for copies it may have, and we will forward them to you when and if we are able to obtain them. For your information, we have enclosed as Exhibit D a copy of a Profile Sheet, dated May 8, 1984, characterizing lead azide process wastes for disposal.

4. You asked us to describe and document the period during which hazardous wastes were received at this tank, and to identify the last day such wastes were received. Although we have not been able to establish the specific date on which the Boat Mold was installed, we believe that it probably was placed into service near the end of 1979. By the same token, although we can establish no specific date on which the Boat Mold was removed, we believe that it probably was removed in early June 1981 (see below).

5. You asked us to describe and document the closure of this tank, including information on the disposal of wastes from, and the fate of, the tank. As described above, we believe that the Boat Mold was removed in early June 1981. Based upon our review of the manifests, service orders, and operating records, and interviews with employees who worked at the facility at that time, the general practice at the facility was to pump the wastes from the Boat Mold and other lead azide tanks and to transfer them to the surface impoundment near Building 317. At some subsequent date, the waste would be pumped from the impoundment, manifested, and transported to Kettleman Hills for disposal.

According to an employee who was directly involved in the removal of the Boat Mold, the waste was removed and transferred to the Building 317 surface impoundment. He recalls that the Boat Mold was thoroughly cleaned and rinsed, and that the rinsate was placed in the same impoundment. He indicated that there were no spills during the removal operation and that the hull was in good shape. Our recent inspection showed that the hull still appears to be in good shape. A copy of the analytical results of soil samples taken at the time of the removal of the Boat Mold are attached as Exhibit E. After the Boat Mold was cleaned and rinsed, it was moved away from the lead azide process area to its present location, approximately 300 yards west of the lead azide process.

As we indicated previously, the impoundments referred to in the Part A were the impoundment located near Building 342 and the impoundment located near Building 317. All wastes were removed from these impoundments when they were closed in 1983. You previously have received copies of correspondence between Bermite and the Department of Health Services regarding the closure of these impoundments. We trust that the information provided above responds to your inquiry.

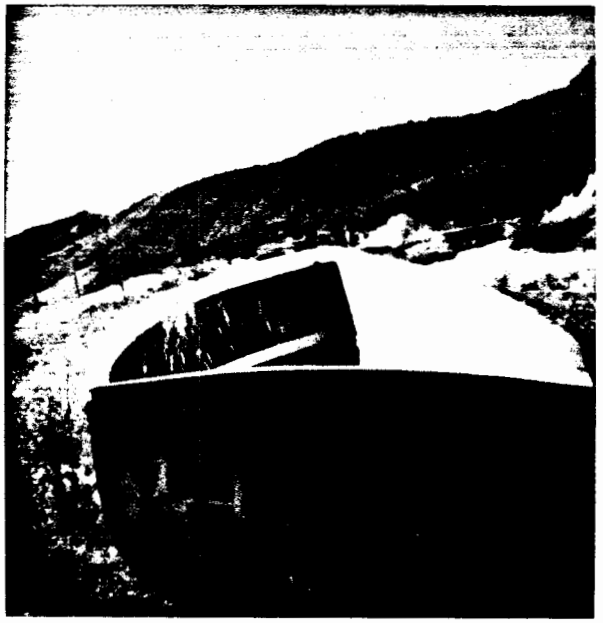
Please call me if you have any questions or if you require further information.

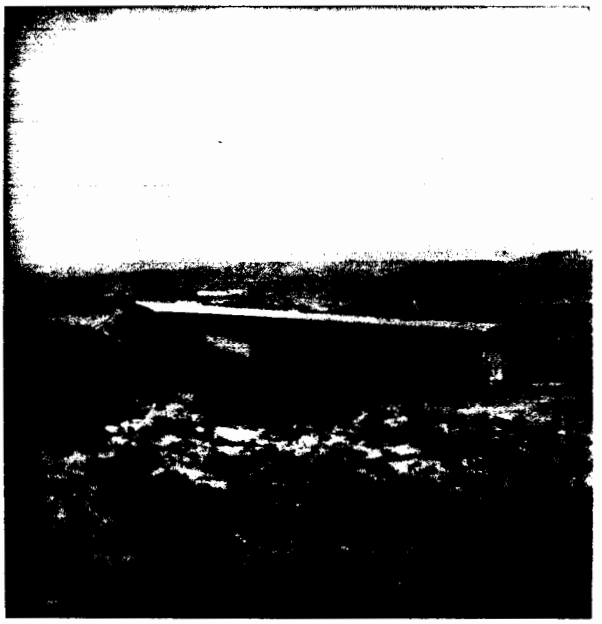
Sincerely,

Thomas J. Bloom
Director, Enviromental Affairs

cc: Larry N. Bohanan
Gordon J. Louttit, Jr., Esq.
Al Simmons
Sol Spiller

PICTURES OF BOAT MOLD





W 2/7/86

**BERMITE**

Bermite Division
Whittaker Corporation
22116 West Soledad Canyon Road
Saugus, California 91350
805/259-2241 213/629-1403
TWX 910-336-1117

Whittaker

29 January 1986

VIA PURALATOR

Mr. Philip L. Bobel
Chief Waste Programs Branch
U.S. Environmental Protection Agency
Region IX
215 Fremont Street
San Francisco, CA 904105

Dear Mr. Bobel:

Bermite Division Whittaker Corporation, EPA I.D. Number, CAD 064573108 is resubmitting EPA Forms 3510-1 and 3510-3 pages 1 through 5, in response to the redefinition of the universe of certain solvents as published in the Federal Register/Vol. 5, No. 251/Tuesday, 31 December 1985, pages 53315 through 53319 and as listed in 40CFR 261.31 hazardous wastes from nonspecific sources.

The EPA hazardous waste code numbers listed on page 3 of 5, form 3510-3 of our revised application dated 08/06/85 are considered as spent solvents including mixtures greater than 10% by volume of the listed solvent and as such is in conformance with the redefinition of listed spent solvent rule.

Should you have any questions or require additional information, please contact me at (805) 251-8758.

Sincerely

Bermite Division
Whittaker Corporation

Thomas J. Bloom
Director Environmental Affairs

TJB:ak

enclosures

cc: Barry Cofer (T-3-2) ✓